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ANZA TECHNOLOGY, INC.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

Anza Technology, Inc.,

Plaintiff,

v.

D-Link Systems, Incorporated

Defendant.

Case No. **'16CV1263 BAS KSC**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Plaintiff Anza Technology, Inc. ("Anza" or "Plaintiff"), by and through its undersigned counsel, complains and alleges against Defendant D-Link Systems, Inc. ("D-Link" or "Defendant") as follows:

**NATURE OF THE ACTION**

1. This is a civil action for infringement of a patent arising under the laws of the United States relating to patents, 35 U.S.C. § 101, *et seq.*, including, without limitation, 35 U.S.C. §§ 271, 281. Plaintiff Anza seeks a preliminary and permanent injunction and monetary damages for patent infringement.

## JURISDICTION AND VENUE

2. This court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a) and pursuant to the patent laws of the United States of America, 35 U.S.C. § 101, *et seq.*

3. Venue properly lies within the Southern District of California pursuant to the provisions of 28 U.S.C. §§ 1391(b), (c), and (d) and 1400(b). On information and belief, Defendant conducts substantial business directly and/or through third parties or agents in this judicial district by selling and/or offering to sell the infringing products and/or by conducting other business in this judicial district. Furthermore, Plaintiff is informed and believes that Defendant engages in business in this district, and that Plaintiff has been harmed by Defendant's conduct, business transactions and sales in this district.

4. This Court has personal jurisdiction over Defendant because, on information and belief, Defendant is registered to do business in the State of California and is headquartered and maintains an office at 17595 Mt. Herrmann St., Fountain Valley, California. Also, Plaintiff is informed and believes that Defendant transacts continuous and systematic retail business within the State of California and the Southern District of California. This Court has personal jurisdiction over the Defendant because Plaintiff is informed and believes that this Defendant's infringing activities, including, without limitation, the making, using, selling and/or offers for sale of infringing products occur in the State of California and the Southern District of California. In particular, Defendant sells its infringing product at local retail stores within the Southern District including but not limited to Best Buy, Office Depot, WalMart and other local retail locations. Finally, this Court has personal jurisdiction over Defendant because, on information and belief, Defendant has made, used, sold and/or offered for sale its infringing products and placed such infringing products in the stream of interstate commerce with the expectation that such infringing products would be made, used, sold and/or offered

1 for sale within the State of California and the Southern District of California.

2 5. Upon information and belief, certain of the products manufactured by  
3 or for Defendant have been and/or are currently designed and/or offered for sale by  
4 Defendant through an in-house sales and marketing team operating in California.

5 **PARTIES**

6 6. Plaintiff Anza is a corporation organized and existing under the laws  
7 of the State of California with an office and principal place of business at 4121  
8 Citrus Avenue, Suite 4, Rocklin, California 95677. Anza is a designer,  
9 manufacturer and seller of bonding tools; ESD tools and other products directed to  
10 the manufacture and assembly of electronics, in particular the bonding of  
11 electrostatic-sensitive devices.

12 7. Upon information and belief, D-Link is a corporation organized and  
13 existing under the laws of the State of California, with a principal place of business  
14 at 17595 Mt. Herrmann St., Fountain Valley, California.

15 **THE ACCUSED PRODUCTS**

16 8. The Defendant's accused products for purposes of the asserted patents  
17 include but are not limited to its electronics hardware products that utilize  
18 integrated circuit chips that were manufactured and mounted on printed circuit  
19 boards using a "flip chip" bonding process, sold under the "D-Link" brand or as  
20 manufactured and sold under other brands (the "Accused Products").

21 9. Plaintiff is informed and believes and thereupon alleges that  
22 Defendant designs, manufactures and/or assembles or imports products that depend  
23 on high density integrated circuit ("IC") chips that are manufactured and mounted  
24 on printed circuit boards using a "flip chip" bonding process that require special  
25 electrostatic discharge ("ESD") handling in the Accused Products' assembly  
26 process.

27 10. Plaintiff is informed and believes and thereupon alleges that  
28 Defendant specifies that its Accused Products are manufactured and/or assembled

1 to certain standards of ESD controls as published by ANSI, JEDEC, the IEC and/or  
2 the ESDA.

3 **THE ASSERTED PATENTS**

4 11. On October 24, 2006, the United States Patent and Trademark Office  
5 (“USPTO”) duly and legally issued United States Patent No. 7,124,927 B2 entitled  
6 “FLIP CHIP BONDING TOOL AND BALL PLACEMENT CAPILLARY” (“the  
7 ’927 patent”). Steven F. Reiber is the patent’s sole named inventor and Plaintiff is  
8 owner, by assignment, of the entire right, title and interest in and to the ’927 patent  
9 and vested with the right to bring this suit for damages and other relief. A true and  
10 correct copy of the ’927 patent is attached hereto as Exhibit “A.”

11 12. On June 24, 2008, the USPTO duly and legally issued United States  
12 Patent No. 7,389,905 B2 entitled “FLIP CHIP BONDING TOOL TIP” (“the ’905  
13 patent”). Steven F. Reiber is the patent’s sole named inventor and Plaintiff is  
14 owner, by assignment, of the entire right, title and interest in and to the ’905 patent  
15 and vested with the right to bring this suit for damages and other relief. A true and  
16 correct copy of the ’905 patent is attached hereto as Exhibit “B.”

17 **COUNT ONE**

18 **INFRINGEMENT OF THE ’927 PATENT BY DEFENDANT**

19 13. Plaintiff re-alleges and incorporates by reference each of the  
20 allegations set forth in paragraphs 1 through 12 above.

21 14. Defendant has knowledge of infringement of the ’927 patent since at  
22 least the filing of this complaint.

23 15. The Accused Products utilize a flip chip bonding technique during  
24 manufacture and/or assembly. Flip chip bonding is used for packaging and  
25 mounting integrated circuit devices utilized in the Accused Products utilizing  
26 dissipative materials during handling so as to reduce ESD damage.

27 16. Flip chip bonding in the manner described in claim 16 of the ’927  
28 patent has become the standard for mounting ESD-sensitive devices in order to

1 decrease parasitic resistance, inductance, and capacitance. The method of claim 16  
2 of the '927 patent to reduce damage to ESD-sensitive devices is reflected in a  
3 number of manufacturing standards, including, *e.g.*, the ANSI ESD S20.20  
4 standard. By way of example, the ANSI standard specifies that current state of the  
5 art manufacturing techniques involving ESD-sensitive devices require the use of  
6 tools that utilize dissipative materials, *i.e.*, materials that ANSI defines as having a  
7 resistance value between  $1 \times 10^4$  and  $1 \times 10^{11}$  ohms surface or volume resistance.  
8 Such specification from the standard is within the range set forth in the '927 patent.  
9 Plaintiff believes and alleges that other applicable ESD standards require  
10 substantially similar resistance values.

11 17. Plaintiff is informed and believes and thereon alleges that Defendant  
12 manufactures and assembles the Accused Products, or contracts with others to  
13 manufacture and assemble the Accused Products, in compliance with one or more  
14 of these ESD standards.

15 18. In addition, Plaintiff is informed and believes and thereon alleges that  
16 during manufacture and assembly of the Accused Products, Defendant and/or its  
17 contractors, utilize conductive adhesives, such as solder, as packaging  
18 interconnects. These packaging interconnects are formed over the wafer in the  
19 form of bumps or balls, spherical in shape, which bumps are electrically and  
20 thermally conductive. The packaging interconnects – or solder balls – are heated  
21 and pressed against die or substrate pads to form a conductive bump or contact  
22 point between the die and the flex.

23 19. In addition, Plaintiff is informed and believes and thereon alleges that  
24 the Accused Products use chipsets that utilize mounting systems, including but not  
25 limited to ball grid array(s) that are susceptible to damage resulting from ESD.  
26 Following proper manufacturing techniques, the Defendant uses assembly tools  
27 that feature the infringing dissipative and resistive technology taught by the  
28 Asserted Patents.

20. The Accused Products, alone or in combination with other products, directly or alternatively, under the doctrine of equivalents, therefore infringe each of the limitations of independent claim 16 of the '927 patent in violation of U.S.C. § 271(g) when Defendant imports into the United States or offers to sell, sells, or uses within the United States a product which is made by the processes described above.

## **COUNT TWO**

### **INFRINGEMENT OF THE '905 PATENT BY DEFENDANT**

21. Plaintiff re-alleges and incorporates by reference each of the allegations set forth in paragraphs 1 through 12 above.

22. Defendant has knowledge of infringement of the '905 patent since at least the filing of this complaint.

23. The Accused Products utilize a flip chip bonding technique during manufacture and/or assembly. Flip chip bonding is used for packaging and mounting integrated circuit devices utilized in the Accused Products utilizing dissipative materials during handling so as to reduce ESD damage.

24. Flip chip bonding in the manner described in claims 53 and 55 of the '905 patent has become the standard for mounting ESD-sensitive devices in order to reduce parasitic resistance, inductance, and capacitance. The methods of claims 53 and 55 of the '905 patent are reflected in a number of manufacturing standards, including, *e.g.*, the ANSI ESD S20.20 standard. By way of example, the ANSI standard specifies that the current state of the art manufacturing techniques involving ESD sensitive devices utilize tools with dissipative materials, *i.e.*, materials that ANSI defines as having a resistance value between  $1 \times 10^4$  and  $1 \times 10^{11}$  ohms surface or volume resistance. Such specification from the standard is within the range set forth in the '905 patent. Plaintiff believes and alleges that other applicable ESD standards require substantially similar resistance values.

25. Plaintiff is informed and believes and thereon alleges that Defendant

1 manufactures and assembles the Accused Products or contracts with others to  
 2 manufacture and assemble the Accused Products in compliance with one or more  
 3 of these ESD standards.

4 26. In addition, Plaintiff is informed and believes and thereon alleges that  
 5 Defendant manufactures and assembles the Accused Products utilizing conductive  
 6 adhesives per the method described by claim 53 and 55 of the '905 patent.  
 7 Conductive adhesive, such as solder, is used as packaging interconnects in the  
 8 Accused Products. The packaging interconnects are formed over the wafer in the  
 9 form of bumps or balls, spherical in shape, which bumps are electrically and  
 10 thermally conductive. The packaging interconnects – or solder balls – are heated  
 11 and pressed against die or substrate pads to form a conductive bump or contact  
 12 point between the die and the flex.

13 27. In addition, Plaintiff is informed and believes and thereon alleges that  
 14 the Accused Products use chipsets that utilize mounting systems, including but not  
 15 limited to ball grid array(s) that are susceptible to damage resulting from ESD.  
 16 Following proper manufacturing techniques, the Defendant uses assembly tools  
 17 that feature the infringing dissipative and resistive technology taught by the  
 18 Asserted Patents.

19 28. The Accused Products, alone or in combination with other products,  
 20 directly or alternatively under the doctrine of equivalents infringe each of the  
 21 limitations of independent claims 53 and 55 of the '905 patent in violation of 35  
 22 U.S.C. § 271(g) when Defendant imports into the United States or offers to sell,  
 23 sells, or uses within the United States a product which is made by the processes  
 24 described above.

### 25 **PRAYER FOR RELIEF**

26 WHEREFORE, Plaintiff prays for relief and judgment as follows:

- 27 1. That Defendant has infringed the Patents-in-Suit;
- 28 2. Compensation for all damages caused by Defendant's infringement of

1 the Patents-in-Suit to be determined at trial;

2 3. A finding that this case is exceptional and an award of reasonable  
3 attorneys fees pursuant to 35 U.S.C. § 285;

4 4. Granting Plaintiff pre-and post-judgment interest on its damages,  
5 together with all costs and expenses; and,

6 5. Awarding such other relief as this Court may deem just and proper.

7 HANDAL & ASSOCIATES

8  
9 Dated: May 26, 2016

By: /s/ Gabriel G. Hedrick

Gabriel G. Hedrick

10 Attorneys for Plaintiff

11 Anza Technology, Inc.

12  
13 **DEMAND FOR JURY TRIAL**

14 Plaintiff hereby demands a trial by jury on all claims.

15 HANDAL & ASSOCIATES

16  
17 Dated: May 26, 2016

By: /s/ Gabriel G. Hedrick

Gabriel G. Hedrick

18 Attorneys for Plaintiff

19 Anza Technology, Inc.